

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DARLENE ANDREASIK,

Plaintiff,

v.

RYAN, LLC,

Defendant.

Case No. 1:15-cv-07159

Honorable James B. Zagel

Magistrate Judge Young B. Kim

JOINT MOTION TO EXTEND DISCOVERY

Plaintiff Darlene Andreasik, through her undersigned counsel, and Defendant Ryan, LLC, through its undersigned counsel, hereby file this Joint Motion to Extend Discovery. In support of this Motion, the Parties state as follows:

1. The Court has set a current discovery cut-off date of June 30, 2016.
2. The Parties have exchanged written discovery and taken depositions.
3. Plaintiff subpoenaed Stan Womack, former Vice President of Human Resources at Defendant, for deposition originally scheduled to take place on June 22, 2016, in Texas, where Mr. Womack resides. Defendant has identified Mr. Womack in its Rule 26 Initial Disclosure list of persons who are likely to have discoverable information. In addition, the Parties have identified Plaintiff's doctors at Barrington Healthcare for Women as persons with documents that may be used to support a claim or defense in this case, and the Parties have agreed that Defendants will obtain those records.
4. After receiving the subpoena for deposition, Mr. Womack indicated to Plaintiff's counsel that due to scheduling conflicts, he needs the Parties to reschedule the deposition to July

8, 2016.

5. All Parties have confirmed availability on July 8, 2016 for the deposition.

6. The Parties are also taking steps to subpoena and release certain records from Barrington Healthcare for Women.

7. As such, the Parties respectfully request that the Court extend the current fact-discovery cut-off to July 31, 2016, so that Plaintiff can complete the last outstanding deposition and document retrieval.

8. The requested extension is not sought for purposes of delay, and no party will be prejudiced by the extension.

WHEREFORE, the Parties respectfully request that this Court enter an Order granting their Joint Motion to Extend Discovery and set the discovery cut-off date for July 31, 2016.

Respectfully submitted,

BY: DARLENE ANDREASIK

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CERTIFICATE OF SERVICE

The undersigned attorney certifies that she caused a true and accurate copy of the foregoing document(s) to be served via Email on June 24, 2016 upon the following counsel of record:

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